

# Exhibit B

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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DANIEL'LA DEERING,

Plaintiff,

Case No.: 0:20-cv-01534-DSD-BRT

v.

**PLAINTIFF'S SUPPLEMENTAL  
ANSWERS TO DEFENDANTS'  
INTERROGATORIES (SET I)**

LOCKHEED MARTIN CORPORATION,  
MARYANNE LAVAN, and  
KENNETH BASTIAN,

Defendants.

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Plaintiff Daniel'la Deering, for her Supplemental Answers to Defendants' First Set of Interrogatories, provides the following Supplemental Answers and Objections in accordance with the requirements of Rules 26 and 33 of the Federal Rules of Civil Procedure.

**GENERAL OBJECTIONS AND QUALIFICATIONS**

1. Plaintiff objects to Defendants' Instructions deeming its Interrogatories as continuing and requiring Plaintiff to provide verified supplemental answers setting forth any additional information within the scope of the interrogatories as may be acquired by Plaintiff to the extent that such instructions impose a duty on Plaintiff beyond the Supplementation of Responses Requirement of Fed. R. Civ. P. 26(e). Rule 26 requires reasonable amendments to interrogatory responses only with respect to materially

- **Jacqueline Monroe**, 5900 Chowen Ave S, Edina, MN 55435
- **Phillip Miner**, 1306 Alderman Road E, Jacksonville, FL 32211
- **Jermaine Marshall**, 1809 Irving Avenue S, Minneapolis, MN 55403
- **Erika Keaton**, 1514 Fremont Avenue N, Minneapolis, MN 55411
- **Denise Deering**, 1400 E 18<sup>th</sup> Street, Des Moines, IA 50316
- **Loren Deering, III**, 3404 E 42nd Street, Des Moines, IA 50316
- **Staff of the Equal Employment Opportunity Commission**

**INTERROGATORY NO. 14:** Describe in detail your employment (including self-employment) since the termination of your employment by Lockheed Martin, stating the identity of your employer, your business address and telephone number, your job title, the identity of your supervisor, a description of your job duties, and your compensation and employee benefits.

**PLAINTIFF'S ANSWER:** Contract Attorney, The Forum Group, contact Shawn Ball 260 Madison Avenue, Suite 200, New York, NY 10016 working at Land O'Lakes, 4001 Lexington Avenue N., Arden Hills, MN 55126, Supervisor, Charles Von Felt, work on overflow matters in the legal department, - contract reviews, litigation, HR advise and employment law issues, IP issues. No benefits, \$125/hr.

**INTERROGATORY NO. 15:** Identify each employer with whom you applied for or otherwise sought employment during or after your employment at Lockheed Martin, stating for each the name, business address and telephone number, the title of the